

BOBBY JINDAL
GOVERNOR



HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20060002
Agency Interest No. 85652

Mr. Paul Soileau
Responsible Official
PO Box 150
c/o Bldg 3502
Plaquemine, LA 70765-0150

RE: Part 70 Operating Permit Renewal, Plaquemine Cogeneration Plant
Dow Chemical Company, Plaquemine, Iberville Parish, Louisiana

Dear Mr. Soileau:

This is to inform you that the permit renewal for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2013, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2008.

Permit No.: 1280-00096-V2

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
CSN:dcd
c: EPA Region VI

**AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**PLAQUEMINE COGENERATION PLANT
AGENCY INTEREST NO.: 85652
DOW CHEMICAL CO.
PLAQUEMINE, IBERVILLE PARISH, LOUISIANA**

I. Background

The Dow Chemical Company's Plaquemine Cogeneration Plant is an existing electric and steam utility cogeneration facility. American Electric Power's (AEP) Ventures Lease Co. was the former owner and operator before the facility changed ownership on November 30, 2006. The facility also became contiguous upon the change in ownership with The Dow Chemical Company's Louisiana Operations, Agency Interest No. 1409. The Dow Chemical Company's Plaquemine Cogeneration Plant currently operates under Permit No. 1280-00096-V1, issued October 3, 2003 and administratively amended March 21, 2005 and June 13, 2006.

This is the Part 70 operating permit renewal for the facility.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted on June 6, 2006 requesting a Part 70 operating permit renewal. Additional information dated August 18, 2006, May 11, 2007, June 15, 2007, August 15, 2007, and November 29, 2007, was also received.

III. Description

The Dow Chemical Company's Plaquemine Cogeneration Plant generates electrical power through the operation of four natural gas fired GE Frame 7 FA combustion turbines (Source ID Nos. GT-500, GT-600, GT-700 and GT-800). Each turbine has a nominal power rating of 170 MW and typical operational heat input of 1,758 MMBtu/hr-HHV (higher heating value) combusted natural gas. A higher firing rate of approximately 1,894 MMBtu/hr-HHV is utilized when performing steam injection during peak operations. The maximum firing rate of 1,931 MMBtu/hr-HHV occurs during cold weather operations.

The turbines are equipped with dry low NOx combustors capable of achieving a NOx concentration of 9 ppmvd (parts per million, volumetric dry) @ 15% O₂ at the exhaust during non-peaking operations. Steam injection is not used by the facility as a method of NOx control.

Following each turbine is a HRSG (Heat Recovery Steam Generator) with a supplementally – fired duct burner system capable of firing pure natural gas, plant produced fuel gas between 0-60% hydrogen with a balance of methane provided by a host facility, and/or a pure stream of hydrogen gas provided by a host facility. Each duct burner system is equipped with two separate sets of duct burners. One set of burners exclusively fires the pure hydrogen fuel stream and the

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incoming combustion air.

All turbines located at the Plaquemine Cogeneration Plant are subject to 40 CFR 63, Subpart YYYY – National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines. Because the turbines were constructed prior to January 14, 2003, they do not presently have to meet the requirements of 40 CFR 63, Subpart YYYY unless reconstructed or replaced.

The HRSGs use the hot combustion gas exiting from the turbines to produce steam. Non-contact heating of the boiler feed water produces steam. Each HRSG is supplied with supplementary firing duct burners to increase the steam production as required.

The four HRSGs deliver steam to a steam turbine, nominally rated at 200 MW. Steam for process use is also extracted as it passes through the steam turbine. Remaining steam is condensed using a forced-draft cooling tower and the condensate is recirculated to the HRSGs for reuse, and to minimize intake water. The cooling tower is also the source for minor particulate emissions.

With this modification, Dow Chemical Company proposes to:

- Incorporate startup and shutdown (SU/SD) emissions for the Gas Turbine-HRSG trains (RLP 18 – RLP 21). The SU/SD emissions are shown under GRP 10 – GRP 13 in the “Emission Rates For Criteria Pollutants” portion of this permit.
- Revise the NOx maximum pound per hour emission limitation that applies during normal operations for each of the Gas Turbine-HRSG trains (RLP 18 – RLP 21) in order to address the averaging period differences between this limitation and the 5 ppmvd @ 15% oxygen limitation, which applies on an annual average basis.
- Remove the separate BACT limitations that apply to the HRSG portion (EQT 12 – EQT 15) of the Gas Turbine-HRSG trains. These sources can not operate without the support of the Gas Turbines (EQT 6 – EQT 9), and as a result it is not necessary to have separate BACT limitations for them.

The changes to the BACT requirements for this facility do not reflect a physical change or change in the method of operation.

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Estimated emissions in tons per year are as follows:

<u>Pollutant</u>	<u>Before</u>	<u>After</u>	<u>Change</u>
PM ₁₀	559.40	559.40	-
SO ₂	214.80	214.80	-
NO _X	854.40	854.40	-
CO	2503.20	2503.20	-
VOC	43.00	48.16	+ 5.16

LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Ammonia*	631.50	631.50	-
Formaldehyde	5.80	5.80	-
Sulfuric Acid*	2.00	2.00	-
Total	639.30	639.30	-
VOC TAPs	5.80	5.80	-
*Non-VOC TAPs	633.50	633.50	-

IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, Prevention of Significant Deterioration (PSD), New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP).

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51. However, emissions from the combustion of Group I virgin fossil fuels are exempt per LAC 33:III.5105.B.3.a. Emissions of Ammonia (Class III) do not result from the combustion of any virgin fossil fuels and are subject to the recordkeeping and reporting requirements of LAC 33:III.Chapter 51.

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable

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requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

VII. Effects on Ambient Air

Dispersion Model(s) Used: None

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
PM ₁₀	24-hour	-	150 ug/m ³
NO _x	Annual	-	100 ug/m ³
CO	1-hour	-	40,000 ug/m ³
	8-hour	-	10,000 ug/m ³

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VIII. General Condition XVII Activities

Work Activity	Schedule	PM ₁₀	Emission Rates - tons			VOC
			SO ₂	NO _X	CO	
Plant Produced Fuel Gas Compressor Purging	260 days/year	-	-	-	-	0.92
Plant Produced Fuel Gas Duct Burner Purging	92 days/year (each)	-	-	-	-	0.03
Plant Produced Fuel Gas compressor Lube Oil Collection Tanks (3)	400 gallons /6 weeks	-	-	-	-	0.01

IX. Insignificant Activities

ID No.:	Description	Insignificant Activity per
IA-3	Lube Oil Storage Tank < 0.5 psia.	LAC 33:III.501.B.5.A.3
IA-1	Analyzer Vent	LAC 33:III.501.B.5.A.9
IA-2	Lab Hood	LAC 33:III.501.B.5.A.6
IA-4	Pressurized Ammonia Storage Tank	LAC 33:III.501.B.5.D

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.	Description	LAC 33:III.Chapter																	
		5▲	504	9	11	13	15	2103	2107	2111	2113	2116*	2122	22	29*	51*	53*	56	59*
GRP 4	Plaquemine Cogeneration Plant	1	3	1	1	1					1			1	1	1	1	1	1
EQT 6	Combustion Turbine (GT-500)	1		1	1	1								2	2				
EQT 7	Combustion Turbine (GT-600)	1		1	1	1								2	2				
EQT 8	Combustion Turbine (GT-700)	1		1	1	1								2	2				
EQT 9	Combustion Turbine (GT-800)	1		1	1	1								2	2				
EQT 10	Cooling Tower (CT-1)																		
EQT 12	HRSIG w/Duct Burner for GT-500													2	2				
EQT 13	HRSIG w/Duct Burner for GT-600													2	2				
EQT 14	HRSIG w/Duct Burner for GT-700													2	2				
EQT 15	HRSIG w/Duct Burner for GT-800													2	2				
FUG 1	Fugitive Emissions (F-1)													3					

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III.Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

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KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
 -The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank – The regulations clearly do not apply to this type of emission source.

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X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	40 CFR 60 NSPS												40 CFR 61												40 CFR				
		A	K	D	Da	Db	Dc	GG	KKKK	A	M	V	A	B	Q	YYYY	52	64	68	72	73	75	77	97						
GRP 4	Plaquemine Cogeneration Plant															3	3								2	1				
EQT 6	Combustion Turbine (GT-500)	1						1	3									2								1	1	1	1	
EQT 7	Combustion Turbine (GT-600)	1						1	3									2								1	1	1	1	
EQT 8	Combustion Turbine (GT-700)	1						1	3									2								1	1	1	1	
EQT 9	Combustion Turbine (GT-800)	1						1	3									2								1	1	1	1	
EQT 10	Cooling Tower (CT-1)																3													
EQT 12	HRSG w/Duct Burner for GT-500							1																		1	1	1	1	
EQT 13	HRSG w/Duct Burner for GT-600							1																		1	1	1	1	
EQT 14	HRSG w/Duct Burner for GT-700							1																		1	1	1	1	
EQT 15	HRSG w/Duct Burner for GT-800							1																		1	1	1	1	
FUG 1	Fugitive Emissions (F-1)																													

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
Gas Turbines GT-500-GT 800	Control of Emissions of Nitrogen Oxides [LAC 33.III.2201]	EXEMPT. Sources are subject to a more stringent state or federal NOx emission limitation. [LAC 33.III.2201.C.15]
Duct Burners DB-500-DB-800	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33.III.Chapter 51]	EXEMPT. Emissions from the combustion of Group 1 virgin fossil fuels are exempt. [LAC 33.III.5105.B.3.a]
Entire Facility	NESHAP – National Emission Standards for Hazardous Air Pollutants for Source Categories. [40 CFR 63 Subpart A]	DOES NOT APPLY. Emissions of Hazardous Air Pollutants are < 1 TPY. Facility is not a major source of Hazardous Air Pollutants.
	NESHAP – National Emission Standards for Hazardous Air Pollutants – Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections 112(G) and 112(J). [40 CFR 63 Subpart B]	DOES NOT APPLY. Emissions of Hazardous Air Pollutants are < 1 TPY. Facility is not a major source of Hazardous Air Pollutants.
	CAM - Compliance Assurance Monitoring. [40 CFR 64]	EXEMPT. Sources covered under the Acid Rain Program are exempt from CAM. [40 CFR 64.2(b)(iii)]
	NNSR - Nonattainment New Source Review. [LAC 33.III.504]	DOES NOT APPLY. Facility-wide Volatile Organic Compound (VOC) emissions do not exceed the major source threshold. [LAC 33.III.504.A]

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
Gas Turbines GT-500-GT 800	Standards of Performance for Stationary Combustion Turbines [40 CFR 60 Subpart KKKK] NESHAP - National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines [40 CFR 63 Subpart YYY]	DOES NOT APPLY. Turbines were constructed prior to February 18, 2005.
Fugitive Emissions F-1	Control of Emission of Organic Compounds. [LAC 33:III.2122]	DOES NOT APPLY. Turbines that were constructed or last modified prior to January 14, 2003 do not have to comply with any requirements of this subpart. [40 CFR 63.6090(a)(4)]
Cooling Tower CT-1	NESHAP – National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers. [40 CFR 63 Subpart Q]	DOES NOT APPLY. This facility does not use chromium based additives. [40 CFR 63.400(a)]

The above table provides explanation for either the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
 - 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
 - 2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 - 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and

40 CFR PART 70 GENERAL CONDITIONS

4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
 1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement.
[Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]
- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an

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emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]

- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
 - 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 - 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 - 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 - 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 - 5. changes in emissions would not qualify as a significant modification; and
 - 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
 - 1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 - 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.

40 CFR PART 70 GENERAL CONDITIONS

3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
 4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I Chapter 39, LAC 33.III Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]

40 CFR PART 70 GENERAL CONDITIONS

- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated June 6, 2006, along with supplemental information dated August 18, 2006, May 11, 2007, June 15, 2007, August 15, 2007, and November 29, 2007.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.
This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
- B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
1. Report by June 30 to cover January through March
 2. Report by September 30 to cover April through June
 3. Report by December 31 to cover July through September
 4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services, Air Permits Division, within ninety (90) days after the event, to amend this permit.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. Certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 85652 The Dow Chemical Co - Plaquemine Cogeneration Plant
Activity Number: PER20060002
Permit Number: 1280-00096-V2
Air - Title V Regular Permit Renewal

Also Known As:	ID	Name	User Group	Start Date
	1280-00096	The Dow Chemical Co - Plaquemine Cogeneration Plant	CDS Number	07-06-2000
LAR000051821		The Dow Chemical Co - Plaquemine Cogeneration Plant	Hazardous Waste Notification	12-21-2006
LA0116602		LPDES #	LPDES Permit #	08-08-2004
LAG670070		LPDES #	LPDES Permit #	08-08-2004
LAR10B606		LPDES #	LPDES Permit #	08-03-2001
LAR10B912		LPDES #	LPDES Permit #	07-29-2002
LAR10C028		LPDES #	LPDES Permit #	11-21-2002
90143		Priority 2 Emergency Site AEP Pro Serv Inc Plaquemine Cogeneration Plant	Priority 2 Emergency Site TEMPO Merge	07-25-2006 03-11-2004
Physical Location:		21265 Hwy 1 Gate 10 within Dow Chem Co Plaquemine, LA 70764 (portion of)	Main Phone:	2256853324
Mailing Address:		PO Box 150 LA Hwy 1 Bldg 3502 Plaquemine, LA 70765	Phone (Type)	
Location of Front Gate:		30° 19' 11" latitude, 91° 14' 8" longitude, Coordinate Method: Interpolation - Map, Coordinate Datum: NAD27	Relationship	
Related People:		Name	Mailing Address	
	Dennis Davis		PO Box 150 Plaquemine, LA 707650150	5043538270 (WP)
	Kris Gaus		PO Box 660164 Dallas, TX 752680164	2147771113 (WP)
	Kris Gaus		PO Box 660164 Dallas, TX 752680164	KPGaus@AEP.COI
Related Organizations:		Name	Address	Relationship
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2233538888 (WP)	Air Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2233538888 (WP)	Water Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2233538888 (WP)	Emission Inventory Billing Party
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2233538888 (WP)	Operates
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2233538888 (WP)	Accident Prevention Billing Party for
	The Dow Chemical Co	PO Box 150 Bldg 3502 E Plaquemine, LA 707650150	2233538888 (WP)	Owns
Ventures Lease Co LLC		1 Riverside Plaza Columbus, OH 43215		Agent of Service for

General Information

AI ID: 85652 The Dow Chemical Co - Plaquemine Cogeneration Plant
Activity Number: PER2006002
Permit Number: 1280-00096-V2
Air - Title V Regular Permit Renewal

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit.
Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

INVENTORIES

All ID: 85652 - The Dow Chemical Co - Plaquemine Cogeneration Plant
 Activity Number: PER2006002
 Permit Number: 1280-00096-V2
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
Plaquemine Cogeneration Plant						
EQT0006	GT-500 - Combustion Gas Turbine GT-500		1931 MM BTU/hr	1758 MM BTU/hr		8760 hr/yr (All Year)
EQT0007	GT-600 - Combustion Gas Turbine GT-800		1931 MM BTU/hr	1758 MM BTU/hr		8760 hr/yr (All Year)
EQT0008	GT-700 - Combustion Gas Turbine GT-700		1931 MM BTU/hr	1758 MM BTU/hr		8760 hr/yr (All Year)
EQT0009	GT-800 - Combustion Gas Turbine GT-800		1931 MM BTU/hr	1758 MM BTU/hr		8760 hr/yr (All Year)
EQT0010	CT-1 - Cooling Tower		172900 gallons/min	144000 gallons/min		8760 hr/yr (All Year)
EQT0012	DB-500 - HRSG Duct Burner for GT-500 train		945 MM BTU/hr			8760 hr/yr (All Year)
EQT0013	DB-600 - HRSG Duct Burner for GT-600 train		945 MM BTU/hr			8760 hr/yr (All Year)
EQT0014	DB-700 - HRSG Duct Burner for GT-700 train		945 MM BTU/hr			8760 hr/yr (All Year)
EQT0015	DB-800 - HRSG Duct Burner for GT-800 train		945 MM BTU/hr			8760 hr/yr (All Year)
FUG0002	F-1 - Fugitive Emissions					8760 hr/yr (All Year)
RLP0018	RLP-500 - Common Stack for GT-500/DB-500					8760 hr/yr (All Year)
RLP0019	RLP-600 - Common Stack for GT-600/DB-600					8760 hr/yr (All Year)
RLP0020	RLP-700 - Common Stack for GT-700/DB-700					8760 hr/yr (All Year)
RLP0021	RLP-800 - Common Stack for GT-800/DB-800					8760 hr/yr (All Year)

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
Plaquemine Cogeneration Plant							
EQT0006	GT-500 - Combustion Gas Turbine GT-500						
EQT0007	GT-600 - Combustion Gas Turbine GT-800						
EQT0008	GT-700 - Combustion Gas Turbine GT-700						
EQT0009	GT-800 - Combustion Gas Turbine GT-800						
EQT0010	CT-1 - Cooling Tower						
RLP0018	RLP-500 - Common Stack for GT-500/DB-500	54.34		20		150	208
RLP0019	RLP-600 - Common Stack for GT-600/DB-600	54.34		20		150	208
RLP0020	RLP-700 - Common Stack for GT-700/DB-700	54.34		20		150	208
RLP0021	RLP-800 - Common Stack for GT-800/DB-800	54.34		20		150	208

Relationships:

ID	Description	Relationship	ID	Description
EQT0006	Combustion Gas Turbine GT-500	Vents to	RLP0018	Common Stack for GT-500/DB-500
EQT0007	Combustion Gas Turbine GT-600	Vents to	RLP0019	Common Stack for GT-600/DB-600
EQT0008	Combustion Gas Turbine GT-700	Vents to	RLP0020	Common Stack for GT-700/DB-700
EQT0009	Combustion Gas Turbine GT-800	Vents to	RLP0021	Common Stack for GT-800/DB-800
EQT0012	HRSG Duct Burner for GT-500 train	Vents to	RLP0018	Common Stack for GT-500/DB-500
EQT0013	HRSG Duct Burner for GT-600 train	Vents to	RLP0019	Common Stack for GT-600/DB-600
EQT0014	HRSG Duct Burner for GT-700 train	Vents to	RLP0020	Common Stack for GT-700/DB-700

INVENTORIES

AI ID: 85652 - The Dow Chemical Co - Plaquemine Cogeneration Plant
 Activity Number: PER20060002
 Permit Number: 1280-00096-V2
 Air - Title V Regular Permit Renewal

Relationships:

ID	Description	Relationship	ID	Description
EQT0015	HRSG Duct Burner for GT-800 train	Vents to	RLP0021	Common Stack for GT-800/DB-800
RLP0018	Common Stack for GT-500/DB-500	Controls emissions from	EQT0006	Combustion Gas Turbine GT-500
RLP0018	Common Stack for GT-500/DB-500	Controls emissions from	EQT0012	HRSG Duct Burner for GT-500 train
RLP0019	Common Stack for GT-600/DB-600	Controls emissions from	EQT0007	Combustion Gas Turbine GT-600
RLP0019	Common Stack for GT-600/DB-600	Controls emissions from	EQT0013	HRSG Duct Burner for GT-600 train
RLP0020	Common Stack for GT-700/DB-700	Controls emissions from	EQT0008	Combustion Gas Turbine GT-700
RLP0020	Common Stack for GT-700/DB-700	Controls emissions from	EQT0014	HRSG Duct Burner for GT-700 train
RLP0021	Common Stack for GT-800/DB-800	Controls emissions from	EQT0009	Combustion Gas Turbine GT-800
RLP0021	Common Stack for GT-800/DB-800	Controls emissions from	EQT0015	HRSG Duct Burner for GT-800 train

Subject Item Groups:

ID	Group Type	Group Description
GRP0004	Permitted Total	GRP-004 - Plaquemine Cogeneration Plant
GRP0005	Equipment Group	GRP-005 - Common Requirements Group - Acid Rain
GRP0006	Scenario	GRP-006 - Combustion Gas Turbine GT-500 with HRSG Combined Cycle
GRP0007	Scenario	GRP-007 - Combustion Gas Turbine GT-600 with HRSG Combined Cycle
GRP0008	Scenario	GRP-008 - Combustion Gas Turbine GT-700 with HRSG Combined Cycle
GRP0009	Scenario	GRP-009 - Combustion Gas Turbine GT-800 with HRSG Combined Cycle
GRP0010	Scenario	GRP-010 - SU/SD Operation Turbine GT-500
GRP0011	Scenario	GRP-011 - SU/SD Operation Turbine GT-600
GRP0012	Scenario	GRP-012 - SU/SD Operation Turbine GT-700
GRP0013	Scenario	GRP-013 - SU/SD Operation Turbine GT-800
GRP0014	Equipment Group	GRP-014 - Common Requirements Group - Turbines
GRP0015	Equipment Group	GRP-015 - Common Requirements Group - HRSGs Duct Burners

Group Membership:

ID	Description	Member of Groups
EQT0006	GT-500 - Combustion Gas Turbine GT-500	GRP0000000004, GRP0000000005, GRP0000000006, GRP0000000010, GRP0000000014
EQT0007	GT-600 - Combustion Gas Turbine GT-600	GRP0000000004, GRP0000000005, GRP0000000007, GRP0000000011, GRP0000000014
EQT0008	GT-700 - Combustion Gas Turbine GT-700	GRP0000000004, GRP0000000005, GRP0000000008, GRP0000000012, GRP0000000014
EQT0009	GT-800 - Combustion Gas Turbine GT-800	GRP0000000004, GRP0000000005, GRP0000000009, GRP0000000013, GRP0000000014
EQT0010	CT-1 - Cooling Tower	GRP0000000004, GRP0000000006, GRP0000000015
EQT0012	DB-500 - HRSG Duct Burner for GT-500 train	GRP0000000004, GRP0000000007, GRP0000000015
EQT0013	DB-600 - HRSG Duct Burner for GT-600 train	GRP0000000004, GRP0000000008, GRP0000000015
EQT0014	DB-700 - HRSG Duct Burner for GT-700 train	GRP0000000004, GRP0000000009, GRP0000000015
EQT0015	DB-800 - HRSG Duct Burner for GT-800 train	GRP0000000004, GRP0000000009, GRP0000000015

INVENTORIES

AI ID: 85652 - The Dow Chemical Co - Plaquemine Cogeneration Plant
Activity Number: PER20060002
Permit Number: 1280-00096-V2
Air - Title V Regular Permit Renewal

Group Membership:

ID	Description	Member of Groups
FUG0002	F-1 - Fugitive Emissions	
GRP0005	GRP-005 - Common Requirements Group - Acid Rain	GRP0000000004
GRP0006	GRP-006 - Combustion Gas Turbine GT-500 with HRSG Combined Cycle	GRP0000000004
GRP0007	GRP-007 - Combustion Gas Turbine GT-600 with HRSG Combined Cycle	GRP0000000004
GRP0008	GRP-008 - Combustion Gas Turbine GT-700 with HRSG Combined Cycle	GRP0000000004
GRP0009	GRP-009 - Combustion Gas Turbine GT-800 with HRSG Combined Cycle	GRP0000000004
GRP0010	GRP-010 - SUSD Operation Turbine GT-500	GRP0000000004
GRP0011	GRP-011 - SUSD Operation Turbine GT-600	GRP0000000004
GRP0012	GRP-012 - SUSD Operation Turbine GT-700	GRP0000000004
GRP0013	GRP-013 - SUSD Operation Turbine GT-800	GRP0000000004
GRP0014	GRP-014 - Common Requirements Group - Turbines	GRP0000000004
GRP0015	GRP-015 - Common Requirements Group - HRSGs Duct Burners	GRP0000000004
RLP0018	RLP-500 - Common Stack for GT-500/DB-500	GRP0000000004
RLP0019	RLP-600 - Common Stack for GT-600/DB-600	GRP0000000004
RLP0020	RLP-700 - Common Stack for GT-700/DB-700	GRP0000000004
RLP0021	RLP-800 - Common Stack for GT-800/DB-800	GRP0000000004

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

SIC Codes:		
4911	Electric services	AI85652
4939	Combination utilities, nec	AI85652

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 85652 - The Dow Chemical Co - Plaquemine Cogeneration Plant
 Activity Number: PER2006002
 Permit Number: 1280-00096-V2
 Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC			
	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	Avg lb/hr	Max lb/hr	Tons/Year	
Plaquemine Cogeneration Plant																
EQT 0010 CT-1							0.78	1.37	3.40							
FUG 0002 F-1													0.22	0.26	1.00	
GRP 0006 GRP 0007 GRP-007 GRP 0008 GRP-008 GRP 0009 GRP-009 GRP 0010 GRP-010 GRP 0011 GRP 0012 GRP-012 GRP 0013 GRP-013 RLP 0018 RLP-500 RLP 0019 RLP-500 RLP 0020 RLP-700 RLP 0021 RLP-800	142.90 142.90 212.50 212.50 625.80 625.80 48.80 48.80 240.00 240.00 213.60 213.60 31.70 31.70 38.10 38.10 139.00 139.00 12.30 12.30 40.70 40.70 53.70 53.70 2.40 2.40 4.00 4.00 10.50 10.50 4.00 4.00 10.50 10.50 4.00 4.00 20.00 20.00 20.00 20.00	212.50 212.50 625.80 625.80 48.80 48.80 240.00 240.00 213.60 213.60 31.70 31.70 38.10 38.10 139.00 139.00 12.30 12.30 40.70 40.70 53.70 53.70 2.40 2.40 4.00 4.00 10.50 10.50 4.00 4.00 20.00 20.00 20.00 20.00														

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

Permit Phase Totals:

PM10: 559.40 tons/yr
 SO2: 214.80 tons/yr
 NOx: 854.40 tons/yr
 CO: 2503.20 tons/yr
 VOC: 48.16 tons/yr

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 85652 - The Dow Chemical Co - Plaquemine Cogeneration Plant

Activity Number: PER20060002

Permit Number: 1280-00096-V2

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0006 GRP-006	Ammonia	36.00	43.20	157.90
	Formaldehyde	0.33	0.40	1.45
	Sulfuric acid	0.12	0.41	0.50
GRP 0007 GRP-007	Ammonia	36.00	43.20	157.90
	Formaldehyde	0.33	0.40	1.45
	Sulfuric acid	0.12	0.41	0.50
GRP 0008 GRP-008	Ammonia	36.00	43.20	157.90
	Formaldehyde	0.33	0.40	1.45
	Sulfuric acid	0.12	0.41	0.50
GRP 0009 GRP-009	Ammonia	36.00	43.20	157.90
	Formaldehyde	0.33	0.40	1.45
	Sulfuric acid	0.12	0.41	0.50
RLP 0018 RLP-500	Ammonia			157.90
	Formaldehyde			1.45
	Sulfuric acid			0.50
RLP 0019 RLP-600	Ammonia			157.90
	Formaldehyde			1.45
	Sulfuric acid			0.50
RLP 0020 RLP-700	Ammonia			157.90
	Formaldehyde			1.45
	Sulfuric acid			0.50
RLP 0021 RLP-800	Ammonia			157.90
	Formaldehyde			1.45
	Sulfuric acid			0.50

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

Permit Parameter Totals:

Ammonia: 631.50 tons/yr

Formaldehyde: 5.80 tons/yr

Sulfuric acid: 2.00 tons/yr

SPECIFIC REQUIREMENTS

AI ID: 85652 - The Dow Chemical Co - Plaquemine Cogeneration Plant
Activity Number: PER20060002
Permit Number: 1280-00096-V2
Air - Title V Regular Permit Renewal

GRP0005 Common Requirements Group - Acid Rain

Group Members: EQT0006 EQT0007 EQT0008 EQT0009

- 1 [40 CFR 72.9(a)(2)] Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority, and have an Acid Rain Permit. [40 CFR 72.9(a)(2)]
- 2 [40 CFR 72.9(b)] Monitoring data: Comply with the monitoring requirements as provided in 40 CFR 75. [40 CFR 72.9(b)]
- 3 [40 CFR 72.9(c)(1)] The owners and operators shall hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit and comply with the applicable Acid Rain emissions limitation for sulfur dioxide. [40 CFR 72.9(c)(1)]
- 4 [40 CFR 72.9(c)(5)] An allowance shall not be deducted, in order to comply with the requirements under 40 CFR 72.9(c)(1)(i), prior to the calendar year for which the allowance was allocated. [40 CFR 72.9(c)(5)]
- 5 [40 CFR 72.9(e)(1)] The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR 77. [40 CFR 72.9(e)(1)]
- 6 [40 CFR 72.9(e)(2)] The owners and operators of an affected unit that has excess emissions in any calendar year shall pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR 77, and comply with the terms of an approved offset plan, as required by 40 CFR 77. [40 CFR 72.9(e)(2)]
- 7 [40 CFR 72.9(f)(1)] Keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority.
 - 1.) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24, provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative.
 - 2.) All emissions monitoring information, in accordance with 40 CFR 75, provided that to the extent that part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - 3.) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program.
 - 4.) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program. [40 CFR 72.9(f)(1)]

The designated representative shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR 75 and Subpart I of 40 CFR 72. [40 CFR 72.9(f)(2)]

To determine NOX emissions, install, certify, operate, and maintain in accordance with all the requirements of 40 CFR 75 a NOX-diluent continuous emission monitoring system (consisting of a NOX pollutant concentration monitor and an O2 or CO2 diluent gas monitor) with an automated data acquisition and handling system for measuring and recording NOX concentration (in ppm), O2 or CO2 concentration (in percent O2 or CO2), and NOX emission rate (in lb/mmbtu) discharged to the atmosphere, except as provided in 40 CFR 75.12 and 75.17 and subpart E of 40 CFR 75. The owner or operator shall account for total NOX emissions, both NO and NO2, either by monitoring for both NO and NO2 or by monitoring for NO only and adjusting the emissions data to account for NO2. [40 CFR 75.10(a)(2)]

Determine CO2 emissions by using one of the options in 40 CFR 75.10(a)(3)(i), (ii), or (iii), except as provided in 40 CFR 75.13 and subpart E of 40 CFR 75. [40 CFR 75.10(a)(3)]
- 8 [40 CFR 75.10(a)(2)]
- 9 [40 CFR 75.10(a)(2)]
- 10 [40 CFR 75.10(a)(3)]

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GRP0005 Common Requirements Group - Acid Rain

- 11 [40 CFR 75.10(b)]
The owner or operator shall ensure that each continuous emission monitoring system meets the equipment, installation, and performance specifications in appendix A to 40 CFR 75; and is maintained according to the quality assurance and quality control procedures in appendix B to 40 CFR 75; and shall record SO₂ and NO_x emissions in the appropriate units of measurement (i.e., lb/hr for SO₂ and lb/MM Btu for NO_x). [40 CFR 75.10(b)]
- 12 [40 CFR 75.10(e)]
The owner or operator shall determine and record the heat input rate, in units of MM Btu/hr, to each affected unit for every hour or part of an hour any fuel is combusted following the procedures in appendix F to 40 CFR 75. [40 CFR 75.10(c)]
- 13 [40 CFR 75.10(f)]
The owner or operator shall ensure that each continuous emission monitoring system is capable of accurately measuring, recording, and reporting data, and shall not incur an exceedance of the full scale range, except as provided in sections 2.1.1.5, 2.1.2.5, and 2.1.4.3 of appendix A to 40 CFR 75. [40 CFR 75.10(f)]
- 14 [40 CFR 75.10(g)]
The owner or operator shall record and the designated representative shall report the hourly, daily, quarterly, and annual information collected under the requirements of 40 CFR 75 as specified in subparts F and G of 40 CFR 75. [40 CFR 75.10(g)]
- 15 [40 CFR 75.11(a)(2)]
Measure and record SO₂ emissions by providing information satisfactory to the Administrator using the applicable procedures specified in appendix D to 40 CFR 75 for estimating hourly SO₂ mass emissions. [40 CFR 75.11(d)(2)]
- 16 [40 CFR 75.]
Comply with the applicable provisions of Subpart C-Operation and Maintenance Requirements, Subpart D-Missing Data Substitution Procedures, Subpart F-Recordkeeping Requirements, and Subpart G-Reporting Requirements.
- 17 [TAC 33:III.505]
The designated representative shall submit a complete Acid Rain permit application (including a compliance plan) in accordance with the deadlines specified in 40 CFR 72.30, a complete reduced utilization plan if required under 40 CFR 72.43, and any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit. [40 CFR 72.9(a)(1)]

GRP0006 Combustion Gas Turbine GT-500 with HRSG Combined Cycle

Group Members: EQ10006 EQ10012

- 18 [LAC 33:III.509]
Good combustion practices determined as BACT Carbon monoxide <= 25 ppmvd @ 15% O₂.
Which Month: Phases: Statistical Basis: Annual average
- 19 [LAC 33:III.509]
Permittee shall monitor and record continuous emissions monitoring system (CEMS) data in accordance with the terms and conditions of this permit that shows the emissions of nitrogen oxides during normal operations (i.e., during periods that are not classified as startup or shutdown) of this source for a period of twelve (12) consecutive months. After that time, permittee shall supply a copy of this CEMS data to the Office of Environmental Services for review. Upon review of the information submitted, LDEQ will make a determination regarding whether or not the permittee must submit a permit modification in order to incorporate this data into the permit. If a permit modification is determined to be appropriate, LDEQ will respond in writing indicating a deadline by which the permittee shall be required to submit a permit modification application.
The combination of dry low NO_x burners and selective catalytic reduction (SCR) add-on controls which limit NO_x emissions to 5 ppmvd @ 15% O₂.
Which Months: All Year Statistical Basis: Annual average
The use of clean burning fuels with a maximum of 5 grains/100 scf sulfur fuel content is determined as BACT Sulfur dioxide <= 3.3 ppmvd.
- 20 [LAC 33:III.509]
- 21 [LAC 33:III.509]

SPECIFIC REQUIREMENTS

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GRP0007 Combustion Gas Turbine GT-600 with HRSG Combined Cycle

Group Members: EQT0007 EQT0013

- 22 [LAC 33:III.509] Good combustion practices determined as BACT Carbon monoxide <= 25 ppmndv @ 15% O₂.
 Which Months: Phases: Statistical Basis: Annual average
 Permittee shall monitor and record continuous emissions monitoring system (CEMS) data in accordance with the terms and conditions of this permit that shows the emissions of nitrogen oxides during normal operations (i.e., during periods that are not classified as startup or shutdown) of this source for a period of twelve (12) consecutive months. After that time, permittee shall supply a copy of this CEMS data to the Office of Environmental Services for review. Upon review of the information submitted, LDEQ will make a determination regarding whether or not the permittee must submit a permit modification in order to incorporate this data into the permit. If a permit modification is determined to be appropriate, LDEQ will respond in writing indicating a deadline by which the permittee shall be required to submit a permit modification application.
 The combination of dry low NOx burners and selective catalytic reduction (SCR) add-on controls which limit NOx emissions to 5 ppmndv @ 15% O₂ is determined as BACT Nitrogen oxides <= 5.0 ppmndv @ 15% O₂.
 Which Months: All Year Statistical Basis: Annual average
 The use of clean burning fuels with a maximum of 5 grains/100 scf sulfur fuel content is determined as BACT Sulfur dioxide <= 3.3 ppmdv.
- 23 [LAC 33:III.509]
- 24 [LAC 33:III.509]
- 25 [LAC 33:III.509]

GRP0008 Combustion Gas Turbine GT-700 with HRSG Combined Cycle

Group Members: EQT0008 EQT0014

- 26 [LAC 33:III.509] Good combustion practices determined as BACT Carbon monoxide <= 25 ppmndv @ 15% O₂.
 Which Months: Phases: Statistical Basis: Annual average
 Permittee shall monitor and record continuous emissions monitoring system (CEMS) data in accordance with the terms and conditions of this permit that shows the emissions of nitrogen oxides during normal operations (i.e., during periods that are not classified as startup or shutdown) of this source for a period of twelve (12) consecutive months. After that time, permittee shall supply a copy of this CEMS data to the Office of Environmental Services for review. Upon review of the information submitted, LDEQ will make a determination regarding whether or not the permittee must submit a permit modification in order to incorporate this data into the permit. If a permit modification is determined to be appropriate, LDEQ will respond in writing indicating a deadline by which the permittee shall be required to submit a permit modification application.
 The combination of dry low NOx burners and selective catalytic reduction (SCR) add-on controls which limit NOx emissions to 5 ppmndv @ 15% O₂ is determined as BACT Nitrogen oxides <= 5.0 ppmndv @ 15% O₂.
 Which Months: All Year Statistical Basis: Annual average
 The use of clean burning fuels with a maximum of 5 grains/100 scf sulfur fuel content is determined as BACT Sulfur dioxide <= 3.3 ppmdv.
- 27 [LAC 33:III.509]
- 28 [LAC 33:III.509]
- 29 [LAC 33:III.509]

GRP0009 Combustion Gas Turbine GT-800 with HRSG Combined Cycle

Group Members: EQT0009 EQT0015

SPECIFIC REQUIREMENTS

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GRP0009 Combustion Gas Turbine GT-800 with HRSG Combined Cycle

30 [LAC 33:III.509]

Good combustion practices determined as BACT Carbon monoxide ≤ 25 ppmvd @ 15% O₂.

Which Months: Phases: Statistical Basis: Annual average
 Permittee shall monitor and record continuous emissions monitoring system (CEMS) data in accordance with the terms and conditions of this permit that shows the emissions of nitrogen oxides during normal operations (i.e., during periods that are not classified as startup or shutdown) of this source for a period of twelve (12) consecutive months. After that time, permittee shall supply a copy of this CEMS data to the Office of Environmental Services for review. Upon review of the information submitted, LDEQ will make a determination regarding whether or not the permittee must submit a permit modification in order to incorporate this data into the permit. If a permit modification is determined to be appropriate, LDEQ will respond in writing indicating a deadline by which the permittee shall be required to submit a permit modification application.

The combination of dry low NO_x burners and selective catalytic reduction (SCR) add-on controls which limit NO_x emissions to 5 ppmvd @ 15% O₂ is determined as BACT Nitrogen oxides ≤ 5.0 ppmvd @ 15% O₂.
 Which Months: All Year Statistical Basis: Annual average

The use of clear burning fuels with a maximum of 5 grains/100 scf sulfur fuel content is determined as BACT Sulfur dioxide ≤ 3.3 ppmvd.
 Which Months: All Year Statistical Basis: Annual average

GRP0014 Common Requirements Group - Turbines

Group Members: EQT0006 EQT0007 EQT0008 EQT0009

34 [40 CFR 60.332(a)(1)]

Nitrogen oxides ≤ 0.0175 % by volume at 15% oxygen and on a dry basis in gases discharged to the atmosphere. Use analytical methods and procedures that are accurate to within 5 percent and are approved by DEQ to determine the nitrogen content of the fuel being fired per 40 CFR 60.335(a). Subpart GG. [40 CFR 60.332(a)(1)]

35 [40 CFR 60.333(b)]

Fuel sulfur content ≤ 0.8 % by weight (8000 ppmw) for any fuel burned. Subpart GG. [40 CFR 60.333(b)]

36 [40 CFR 60.334(e)]

Monitor the steam or water to fuel ratio or other parameters that are continuously monitored as described in 40 CFR 60.334(a), (d) or (f) during the performance test required under 40 CFR 60.8, to establish acceptable values and ranges. Develop and keep on-site a parameter monitoring plan which explains the procedures used to document proper operation of the NO_x emission controls. Include the parameter(s) monitored and the acceptable range(s) of the parameter(s) as well as the basis for designating the parameter(s) and acceptable range(s). Include any supplemental data such as engineering analyses, design specifications, manufacturer's recommendations and other relevant information in the monitoring plan. Subpart GG. [40 CFR 60.334(g)]

37 [40 CFR 60.334(h)(1)]

Fuel sulfur content monitored by the regulation's specified method(s) at the regulation's specified frequency, except as specified in 40 CFR 60.334(h)(3). Monitor the total sulfur content of the fuel being fired in the turbine using total sulfur methods described in 40 CFR 60.335(b)(10). Subpart GG. [40 CFR 60.334(h)(1)]

38 [40 CFR 60.334(j)(3)]

Which Months: All Year Statistical Basis: None specified
 Submit quarterly excess emissions report. Due by the 30th day following the end of each calendar quarter. Report periods during which an exemption provided in 40 CFR 60.332(f) is in effect. Report the date and time the air pollution control system was deactivated, and the date and time the air pollution control system was reactivated. Subpart GG. [40 CFR 60.334(j)(3)]

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GRP0014 Common Requirements Group - Turbines

- 39 [40 CFR 60.334(j)(4)]
 40 [40 CFR 60.334(j)]
 41 [40 CFR 60.335]
 42 [40 CFR 63.6090(a)(4)]

Include each period during which an exemption provided in 40 CFR 60.332(k) is in effect in the report required in 40 CFR 60.7(c). For each period, report the type, reasons, and duration of the firing of the emergency fuel. Subpart GG. [40 CFR 60.334(j)(4)]
 Submit excess emissions reports and monitor downtime in accordance with 40 CFR 60.7(c). Report excess emissions for all periods of unit operation, including startup, shutdown, and malfunction. Subpart GG. [40 CFR 60.334(j)]
 Determine compliance using the test methods and procedures specified in 40 CFR 60.335(a) through (c). Subpart GG.
 Combustion Turbines GT-500, GT-600, GT-700 and GT-800 are subject to 40 CFR 63, Subpart YYYY - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines. Because the turbines were constructed prior to January 14, 2003, they do not presently have to meet the requirements of 40 CFR 63, Subpart YYYY unless reconstructed or replaced. [40 CFR 63.6090(a)(4)]

GRP0015 Common Requirements Group - HRSGs Duct Burners

Group Members: EQT0012 EQT0013 EQT0014 EQT0015

- 43 [40 CFR 60.42Da(a)(1)]
 Particulate matter (10 microns or less) <= 0.03 lb/MMBTU (13 ng/J) heat input. Subpart Da. [40 CFR 60.42Da(a)(1)]
 Which Months: All Year Statistical Basis: None specified
 Opacity <= 20 percent, except for one 6-minute period per hour of not more than 27% opacity. Subpart Da. [40 CFR 60.42Da(b)]
 Which Months: All Year Statistical Basis: Six-minute average
 Sulfur dioxide <= 0.20 lb/MMBTU (86 ng/J) heat input. Subpart Da. [40 CFR 60.43Da(b)(2)]
 Which Months: All Year Statistical Basis: Thirty-day rolling average
 Nitrogen oxides <= 1.6 lb/MWh (200 ng/J) heat input. Subpart Da. [40 CFR 60.44Da(d)(1)]
 Which Months: All Year Statistical Basis: Thirty-day rolling average
 Comply with the particulate matter emission standards under 40 CFR 60.42Da at all times except during periods of startup, shutdown, or malfunction. Subpart Da. [40 CFR 60.48Da(c)]
 Show compliance with the sulfur dioxide standards by completing a separate performance test at the end of each boiler operating day after the initial performance test, and calculating a new 30-day average emission rate and percent reduction. Subpart Da. [40 CFR 60.48Da(e)]
 Determine compliance with the SO2 and NOX emission standards by calculating the arithmetic average of all hourly emission rates for SO2 and NOX for the 30 successive boiler operating days, except for data obtained during startup, shutdown, malfunction (NOX only), or emergency conditions (SO2 only). Subpart Da. [40 CFR 60.48Da(g)(1)]
 Determine compliance with particulate matter emission limitations by calculating the arithmetic average of all hourly emission rates for particulate matter each boiler operating day, except for data obtained during startup, shutdown, and malfunction. Subpart Da. [40 CFR 60.48Da(g)(3)]
 Calculate NOx emissions by multiplying the average hourly NOx output concentration, measured according to the provisions of 40 CFR 60.49Da(c), by the average hourly flow rate, measured according to the provisions of 40 CFR 60.49Da(l), and dividing by the average hourly gross energy output, measured according to the provisions of 40 CFR 60.49Da(k). Subpart Da. [40 CFR 60.48Da(i)]
 Determine compliance with the emission limitation for NOx required by 40 CFR 60.44Da(d)(1) or (e)(1) by using either of the procedures specified in 40 CFR 60.48Da(k)(1) and (k)(2). Subpart Da. [40 CFR 60.48Da(k)]

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GRP0015 Common Requirements Group - HRSGs Duct Burners

- 53 [40 CFR 60.49Da(d)] Oxygen or Carbon dioxide monitored by CMS continuously. Monitor the oxygen or carbon dioxide content of the flue gases at each location where sulfur dioxide or nitrogen oxides emissions are monitored. Subpart Da. [40 CFR 60.49Da(d)]
- 54 [40 CFR 60.49Da(d)] Which Months: All Year Statistical Basis: One-hour average Oxygen or Carbon dioxide recordkeeping by electronic or hard copy continuously. Record the oxygen or carbon dioxide content of the flue gases at each location where sulfur dioxide or nitrogen oxides emissions are monitored. Subpart Da. [40 CFR 60.49Da(d)]
- 55 [40 CFR 60.49Da(f)(1)] Obtain emission data for at least 18 hours in at least 22 out of 30 successive boiler operating days. If this minimum data requirement cannot be met with a continuous monitoring system, supplement emission data with other monitoring systems approved by DEQ or the reference methods and procedures as described in 40 CFR 60.49Da(h). Subpart Da. [40 CFR 60.49Da(f)(1)]
- 56 [40 CFR 60.50Da(a)] Use as reference methods and procedures specified in 40 CFR 60Da, Appendix A or the methods and procedures as specified in 40 CFR 60.50Da, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart Da. [40 CFR 60.50Da(a)]
- 57 [40 CFR 60.50Da(b)] Determine compliance with the particulate matter standards in 40 CFR 60.42Da using the methods and procedures specified in 40 CFR 60.50Da(b)(1) through (b)(3). Subpart Da. [40 CFR 60.50Da(b)]
- 58 [40 CFR 60.50Da(c)] Determine compliance with the sulfur dioxide standards in 40 CFR 60.43Da using the methods and procedures specified in 40 CFR 60.50Da(c)(1) through (c)(5). Subpart Da. [40 CFR 60.50Da(c)]
- 59 [40 CFR 60.50Da(d)] Determine compliance with the nitrogen oxides standard in 40 CFR 60.44Da using the methods and procedures specified in 40 CFR 60.50Da(d)(1) and (d)(2). Subpart Da. [40 CFR 60.50Da(d)]
- 60 [40 CFR 60.51Da(a)] Submit the performance test data from the initial performance test and from the performance evaluation of the continuous monitors (including the transmissometer). Subpart Da. [40 CFR 60.51Da(a)]
- 61 [40 CFR 60.51Da(b)] Submit report: Due semiannually for each six-month period. Submit the information specified in 40 CFR 60.51Da(b)(1) through (b)(9) for each 24-hour period. Subpart Da. [40 CFR 60.51Da(b)]
- 62 [40 CFR 60.51Da(c)] Submit report: Due semiannually for each six-month period. If the minimum quantity of emission data as required by 40 CFR 60.49Da is not obtained for any 30 successive boiler operating days, report the information specified in 40 CFR 60.51Da(c)(1) through (c)(5), obtained under the requirements of 40 CFR 60.48Da(h), for that 30-day period. Subpart Da. [40 CFR 60.51Da(c)]
- 63 [40 CFR 60.51Da(d)] Submit a signed statement if any standards under 40 CFR 60.43Da are exceeded during emergency conditions because of control system malfunction. Indicate if emergency conditions existed and requirements under 40 CFR 60.48Da(d) were met during each period. List the time periods the emergency condition existed; the electrical output and demand on the electric utility system and the affected facility; the amount of power purchased from interconnected neighboring utility companies during the emergency period; the percent reduction in emissions achieved; the atmospheric emission rate (ng/J) of the pollutant discharged; and the actions taken to correct control system malfunction. Submit semiannually for each six-month period. Subpart Da. [40 CFR 60.51Da(d)]
- 64 [40 CFR 60.51Da(f)] Submit a signed statement indicating if any changes were made in operation of the emission control system during periods of data unavailability, for any periods for which opacity, sulfur dioxide or nitrogen oxides emissions data are not available. Submit semiannually for each six-month period. Subpart Da. [40 CFR 60.51Da(f)]

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GRP0015 Common Requirements Group - HRSGs Duct Burners

- 65 [40 CFR 60.51Da(h)] Submit a signed statement indicating whether the required continuous monitoring system calibration, span, and drift checks or other periodic audits have or have not been performed as specified; the data used to show compliance was or was not obtained in accordance with approved methods and procedures of 40 CFR 60 and is representative of plant performance; the minimum data requirements have or have not been met; or, the minimum data requirements have not been met for errors that were unavoidable; and compliance with the standards has or has not been achieved during the reporting period. Submit semiannually for each six-month period. Subpart Da. [40 CFR 60.51Da(h)]
- 66 [40 CFR 60.51Da(i)] Submit excess emissions report: Due quarterly. Submit opacity levels in excess of the applicable opacity standard and the date of such excesses. Subpart Da. [40 CFR 60.51Da(i)]
- 67 [LAC 33:III.501.C.6] To ensure compliance with the requirements contained in this permit, Duct Burners for each HRSIG downstream of the Gas Turbines GT-500, GT-600, GT-700 and GT-800 shall operate continuously in combined cycle mode during normal operation of Turbines except during periods of Startup, Shutdown or performance testing of the Gas Turbines GT-500, GT-600, GT-700 and GT-800.

RLP0018 Common Stack for GT-500/DB-500

- 68 [LAC 33:III.101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel.).
 Which Months: All Year Statistical Basis: None specified

RLP0019 Common Stack for GT-600/DB-600

- 69 [LAC 33:III.101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel.).
 Which Months: All Year Statistical Basis: None specified

RLP0020 Common Stack for GT-700/DB-700

- 70 [LAC 33:III.101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel.).
 Which Months: All Year Statistical Basis: None specified

RLP0021 Common Stack for GT-800/DB-800

- 71 [LAC 33:III.101.B] Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes (Complies by using sweet natural gas as fuel.).
 Which Months: All Year Statistical Basis: None specified

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GRP0004 Plaquemine Cogeneration Plant

Group Members: EQT0006 EQT0007 EQT0008 EQT0009 EQT0010 EQT0012 EQT0013 EQT0014 EQT0015 FUG0002 GRP0005 GRP0006 GRP0007 GRP0008 GRP0009 GRP0010 GRP0011 GRP0012

GRP0013 GRP0014 GRP0015 RLP0018 RLP0019 RLP0020 RLP0021

- 72 [40 CFR 60.] All affected facilities shall comply with all applicable provisions in 40 CFR 60 Subpart A.
- 73 [40 CFR 70.5(a)(1)(iii)] Submit Title V permit application for renewal: Due 180 calendar days before permit expiration date. [40 CFR 70.5(a)(1)(iii)]
- 74 [40 CFR 70.6(a)(3)(iii)(A)] Submit Title V monitoring results report: Due semiannually, by March 31st and September 30th for the preceding periods encompassing July through December and January through June, respectively. Submit reports to the Office of Environmental Compliance, Surveillance Division. Certify reports by a responsible company official. Clearly identify all instances of deviations from permitted monitoring requirements. For previously reported deviations, in lieu of attaching the individual deviation reports, clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. [40 CFR 70.6(a)(3)(iii)(A)]
- 75 [40 CFR 70.6(a)(3)(iii)(B)] Submit Title V excess emissions report: Due quarterly, by June 30, September 30, December 31, March 31. Submit reports of all permit deviations to the Office of Environmental Compliance, Surveillance Division. Certify all reports by a responsible official in accordance with 40 CFR 70.5(d). The reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by 40 CFR 70.6(a)(3)(iii)(A) as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [40 CFR 70.6(a)(3)(iii)(B)]
- 76 [40 CFR 70.6(c)(5)(iv)] Submit Title V compliance certification: Due annually, by the 31st of March. Submit to the Office of Environmental Compliance, Surveillance Division. [40 CFR 70.6(c)(5)(iv)]
- 77 [40 CFR 72.9(c)(1)(ii)] Dow Chemical Company's Plaquemine Cogeneration Plant shall secure one allowance for each ton of SO₂ emitted per year. At the end of the year, each used allowance is retired and cannot be used again. EPA will record allowance transfers that are used for compliance and ensure that Dow Chemical Company's Plaquemine Cogeneration Plant emissions do not exceed the number of allowances it holds via the Allowance Tracking System (ATS). See Subparts C & D of part 73. [40 CFR 72.9(c)(1)(ii)] Comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B.
- 78 [40 CFR 82. Subpart F] Emissions of smoke which pass onto or across a public road and create a traffic hazard by impairment of visibility as defined in LAC 33:III.111 or intensify an existing traffic hazard condition are prohibited.
- 79 [LAC 33:III.1103] Outdoor burning of waste material or other combustible material is prohibited.
- 80 [LAC 33:III.1109.B] Emissions of particulate matter which pass onto or across a public road and create a traffic hazard by impairment of visibility or intensify an existing traffic hazard condition are prohibited.
- 81 [LAC 33:III.1303.B] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- 82 [LAC 33:III.2113.A] Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation or suspension of the applicable permit, license, registration, or variance.
- 83 [LAC 33:III.21.9] Ammonia <= 631.50 tons/yr.
- 84 [LAC 33:III.S01.C.6] Which Months: All Year Statistical Basis: Annual maximum

SPECIFIC REQUIREMENTS

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- 85 [LAC 33:III.501.C.6] Carbon monoxide <= 2503.20 tons/yr.
 Which Months: All Year Statistical Basis: Annual maximum
 Formaldehyde <= 5.80 tons/yr.
- 86 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Annual maximum
 Maintain best practical housekeeping and maintenance practices at the highest possible standards to control emissions of highly reactive volatile organic compounds (HR VOC), which include 1,3-Butadiene, Butene, cis-2-Butene, Ethylene, Propylene, Toluene, Xylene, m/p-Xylene, o-Xylene. (State Only).
- 87 [LAC 33:III.501.C.6] Maintain, to the extent practicable, a leak-free facility taking such steps as are necessary and reasonable to prevent leaks and to expediently repair leaks that occur. Update the written plan presently required by LAC 33:III.2113.A.4 within 30 days of receipt of this permit to incorporate these general duty obligations into the housekeeping procedures. The plan shall then be considered a means of emission control subject to the required use and maintenance provisions of LAC 33:III.905. Failure to develop, use, and diligently maintain the plan shall be a violation of this permit. (State Only).
- 88 [LAC 33:III.501.C.6] Nitrogen oxides <= 854.40 tons/yr.
 Which Months: All Year Statistical Basis: Annual maximum
 Particulate matter (10 microns or less) <= 559.40 tons/yr.
 Which Months: All Year Statistical Basis: Annual maximum
 Sulfur dioxide <= 214.80 tons/yr.
 Which Months: All Year Statistical Basis: Annual maximum
 Sulfuric acid <= 2.00 tons/yr.
 Which Months: All Year Statistical Basis: Annual maximum
 VOC, Total <= 48.16 tons/yr.
- 89 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Annual maximum
 90 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Annual maximum
 91 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Annual maximum
 92 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Annual maximum
 93 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Annual maximum
 94 [LAC 33:III.506.A] Permittee shall comply with LAC 33:III.506 Clean Air Interstate Rule (CAIR) requirements and all the provisions of the CAIR NO_x Federal Implementation Plan (FIP) 40 CFR Part 97, Subparts AA-HH, except for 40 CFR 97.141 and 97.142. [LAC 33:III.506.A, 40 CFR 97.4]
 Comply with the requirements of PSD-LA-659(M-2). This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-659(M-2).
- 95 [LAC 33:III.509] Permittee shall ensure compliance with the opacity and particulate emission limits of this permit by visually inspecting the Combustion Gas Turbines-HRSG Trains with Duct Burners stacks, Emission Points RLP 18, RLP 19, RLP 20, and RLP 21 for opacity on a weekly basis. If visible emissions are detected, then, within three (3) working days, the permittee shall conduct a six-minute opacity reading in accordance with EPA Reference Method 9. Records of visible emission checks shall include the emission point ID number, the date the visual check was performed, a record if visible emissions were detected, and a record and results of any Method 9 testing conducted. These records shall be kept on site and available for inspection by the Office of Environmental Compliance, Surveillance Division.
- 96 [LAC 33:III.509] Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- 97 [LAC 33:III.5107.A.2]

SPECIFIC REQUIREMENTS

AI ID: 85652 - The Dow Chemical Co - Plaqueamine Cogeneration Plant
Activity Number: PER20060002
Permit Number: 1280-00096-V2
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- 98 [LAC 33:III.5107.A] Submit Annual Emissions Report (TED): Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- 99 [LAC 33:III.5107.B.1] Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- 100 [LAC 33:III.5107.B.2] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:I.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:I.3923.
- 101 [LAC 33:III.5107.B.3] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931.
- 102 [LAC 33:III.5107.B.4] Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.i through B.4.a.viii.
- 103 [LAC 33:III.5107.B.5] Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 104 [LAC 33:III.5109.C] Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III.Chapter 51. Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
- 105 [LAC 33:III.5609.A.1.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 5 when the administrative authority declares an Air Pollution Alert.
- 106 [LAC 33:III.5609.A.2.b] Activate the preplanned strategy listed in LAC 33:III.5611.Table 6 when the administrative authority declares an Air Pollution Warning.
- 107 [LAC 33:III.5609.A.3.b] Activate the preplanned abatement strategy listed in LAC 33:III.5611.Table 7 when the administrative authority declares an Air Pollution Emergency.
- 108 [LAC 33:III.5609.A] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.
- 109 [LAC 33:III.5611.A] Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611.Tables 5, 6, and 7.
- 110 [LAC 33:III.5611.A] Submit standby plan for the reduction or elimination of emissions during an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency. Due within 30 days after requested by the administrative authority.

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110 [LAC 33:III.5611.B]

During an Air Pollution Alert, Air Pollution Warning or Air Pollution Emergency, make the standby plan available on the premises to any person authorized by the department to enforce these regulations.

Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.

Identify hazards that may result from accidental releases of the substances listed in 40 CFR 68.130, Table 59.0 of LAC 33:III.5907, or Table 59.1 of LAC 33:III.5913 using appropriate hazard assessment techniques, design and maintain a safe facility, and minimize the off-site consequences of accidental releases of such substances that do occur.

Submit registration: Due January 31, 1998, or within 60 days after the source becomes subject to LAC 33:III.Chapter 59, whichever is later.

Include the information listed in LAC 33:III.5911.B, and submit to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division.

Submit amended registration: Due to the Department of Environmental Quality, Office of Environmental Compliance, Emergency and Radiological Services Division, within 60 days after the information in the submitted registration is no longer accurate.

Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment, Air Quality Assessment Division. Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.

111 [LAC 33:III.5901.A]

112 [LAC 33:III.5907]

113 [LAC 33:III.5911.A]

114 [LAC 33:III.5911.C]

115 [LAC 33:III.919.D]